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JOHN CRIGLER

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JUN 28 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 28, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

OUR FILE NO.  
0655-101

Re: Docket MM No. 93-99  
RM-8202

Dear Mr. Caton:

Transmitted herewith on behalf of Sobocomo Radio, Inc. are the original and four copies of its Reply Comments in the above-captioned rulemaking.

Please direct any communications regarding this matter directly to this office.

Sincerely yours,



RECEIVED

JUN 28 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before The

**Federal Communications Commission**

Washington, D.C. 20554

In The Matter Of )

Amendment of Section 73.202(b) )

Table of Allotments )

FM Broadcast Stations )

(Moberly, Missouri) )

MM Docket No. 93-99  
RM-8202

TO: Chief, Allocations Branch

**REPLY COMMENTS**

Sobocomo Radio, Inc. ("Sobocomo") hereby submits its reply comments in the above-captioned proceeding.

On June 9, 1993, Sobocomo timely filed Comments and Counterproposal in response to the proposal of FM 105, Inc. ("FM 105") to upgrade Channel 288 from Class C3 to Class C2 at Moberly, Missouri. The proposal was short-spaced with Sobocomo's pending proposal to upgrade Sobocomo's construction permit for Channel 291 at Ashland, Missouri (BPH-880219MD) from Class C2 to Class C1.

In its Comments and Counterproposal, Sobocomo pointed out that its counterproposal could be accommodated with FM 105's proposal by imposing a one-kilometer site restriction on the FM 105 proposal. In the event that such a restriction was not imposed, Sobocomo asked that its counterproposal be granted and FM 105's proposal denied. In support of this latter contingency, Sobocomo hereby submits as Attachment 1, a

Technical Statement which compares the area and population served by FM 105's proposal and Sobocomo's counterproposal.

The increases resulting from the respective proposals are as follows:

FM 105 Proposal

|            |                         |
|------------|-------------------------|
| Population | 50,170                  |
| Area       | 4,583 square kilometers |

Sobocomo Proposal


|            |                          |
|------------|--------------------------|
| Population | 149,357                  |
| Area       | 10,864 square kilometers |

As this comparison makes clear, Sobocomo's counterproposal clearly serves the public interest. In the event that the Commission does not grant both FM 105's proposal and Sobocomo's counterproposal, Sobocomo's counterproposal must be preferred.

Respectfully submitted,

SOBOCOMO RADIO, INC.

By:

  
John P. Crigler

Its Attorney

HALEY, BADER & POTTS  
Suite 900  
4350 North Fairfax Drive  
Arlington, VA 22203-1633  
703/841-0606  
June 28, 1993

**MOBERLY, ASHLAND, ROLLA, MONROE CITY, AND WHEELING, MISSOURI**

## Introduction

This technical statement and associated exhibits have been prepared on behalf of Sobocomo Radio, Inc. (herein "Sobocomo") permittee of Channel 291C2 at Ashland, Missouri (BPH-880219MD) in support of its previously filed Comments and Counterproposal filed in response to the FCC Notice of Proposed Rule Making in MM Docket No. 93-99 (herein "Notice"). The Notice was issued in response to the Petition for Rule Making filed by FM 105, Inc. requesting the substitution of Channel 288C2 for Channel 288C3 at Moberly, Missouri. The proposed coordinates of Channel 288C2 at Moberly are short-spaced to the proposed coordinates of Channel 291C1 at Ashland, Missouri in Sobocomo's pending Petition for Partial Reconsideration in MM Docket 91-181.

Sobocomo's Comments in MM Docket 93-99, filed June 11, 1993, counterproposed that Channel 291C1 be substituted for Channel 291C2 at Ashland, Missouri; that Channel 276C2 be substituted for Channel 282C1

**TECHNICAL STATEMENT  
IN SUPPORT OF REPLY COMMENTS  
OF SOBOCOMO RADIO, INC.  
MOBERLY, ASHLAND, ROLLA, MONROE CITY, AND WHEELING, MISSOURI**

**Introduction**

This technical statement and associated exhibits have been prepared on behalf of Sobocomo Radio, Inc. (herein "Sobocomo") permittee of Channel 291C2 at Ashland, Missouri (BPH-880219MD) in support of its previously filed Comments and Counterproposal filed in response to the FCC Notice of Proposed Rule Making in MM Docket No. 93-99 (herein "Notice"). The Notice was issued in response to the Petition for Rule Making filed by FM 105, Inc. requesting the substitution of Channel 288C2 for Channel 288C3 at Moberly, Missouri. The proposed coordinates of Channel 288C2 at Moberly are short-spaced to the proposed coordinates of Channel 291C1 at Ashland, Missouri in Sobocomo's pending Petition for Partial Reconsideration in MM Docket 91-181.

Sobocomo's Comments in MM Docket 93-99, filed June 11, 1993, counterproposed that Channel 291C1 be substituted for Channel 291C2 at Ashland, Missouri, that Channel 276C3 be substituted for Channel 292A at Rolla, Missouri, and that Channel 298A be substituted for Channel 292A at Monroe City, Missouri. The Counterproposal contained a statement from the owner of KQMX(FM) stating that he will apply for and construct a station on Channel 276C3 if the Commission substitutes it for Channel 292A at Rolla, Missouri. Sobocomo's Comments also noted that both the FM 105 Petition and Sobocomo's Counterproposal could be granted if the allocation coordinates for Channel 288C2 at Moberly, Missouri were moved one kilometer north of the site proposed in the Petition.

This technical statement provides additional documentation on the possible modified coordinates of Channel 288C2 at Moberly, Missouri and provides detailed summaries of all relevant areas and populations affected by the channel substitutions proposed herein, utilizing 1990 population data for all studies.

**Proposed Change in FM Table of Allotments**

Sobocomo reaffirms the modifications of the FM Table of Allotments, requested in its June 11, 1993 Counterproposal as follows:

| <u>Present:</u> | <u>City</u>     | <u>Channel</u> |
|-----------------|-----------------|----------------|
|                 | Ashland, MO     | 291C2          |
|                 | Rolla, MO       | 292A*          |
|                 | Monroe City, MO | 292A           |
|                 | Wheeling, MO    | 290A           |

\* Channel 232A modified to Channel 292A in R&O MM Docket 91-181, March 17, 1993.

|                         |                 |        |
|-------------------------|-----------------|--------|
| <b><u>Proposed:</u></b> | Ashland, MO     | 291C1  |
|                         | Rolla, MO       | 276C3  |
|                         | Monroe City, MO | 298A   |
|                         | Wheeling, MO    | 290A** |

**\*\*Reference coordinate change only**

**Proposed Coordinate Change for Channel 288C2 at Moberly, Missouri**

The following channel search further develops an alternate solution noted by Sobocomo in its Counterproposal, that of moving the allocation coordinates of Channel 288C2 at Moberly, Missouri to remove the shortspacing between it and the proposed Channel 291C1 site at Ashland, Missouri. It has been determined that coordinates 39-26-45, 92-22-49 can be used for Channel 288C2 in Moberly in full compliance with Section 73.207 of the Commission's rules.

**Population and Areas**

The presently permitted Ashland operation (BPH-880219MD) provides FM primary (60 dBu, 1mV/m) service to a land area of approximately 8,510 square kilometers containing an estimated population (1990 census) of 232,369 persons. Operation from the proposed reference point with maximum Class C1 facilities would provide FM primary service to a land area of approximately 16,409 square kilometers containing an estimated population of 355,355 persons, resulting in a gain of 122,986 persons.

The presently licensed KDAM(FM) operation on Channel 292A at Monroe City, Missouri provides FM primary (60 dBu, 1mV/m) service to a land area of approximately 1,800 square kilometers containing an estimated population (1990 census) of 10,407 persons. KDAM's operation as a 6kW Class A facility from its presently licensed site on Channel 298A would provide FM primary (60 dBu, 1mV/m) service to a land area of approximately 2,475 square kilometers containing an estimated population (1990 census) of 15,115 persons, resulting in a gain of 4,708 persons.

The present KQMX(FM) operation on Channel 232A\* at Rolla, Missouri provides FM primary (60 dBu, 1mV/m) service to a land area of approximately 1,800 square kilometers containing an estimated population (1990 census) of 35,113 persons. KQMX's operation as a Class C3 facility from the proposed coordinates would provide FM primary (60 dBu, 1mV/m) service to a land area of approximately 4.090

The presently licensed KZZT(FM) operation on Channel 288C3 at Moberly, Missouri provides FM primary (60 dBu, 1mV/m) service to a land area of approximately 4,583 square kilometers containing an estimated population (1990 census) of 50,170 persons. KZZT(FM)'s operation on Channel 288C2 from the site proposed in the Petition would provide FM primary (60 dBu, 1mV/m) service to a land area of approximately 8,549 square kilometers containing an estimated population (1990 census) of 107,552 persons, resulting in a gain of 57,382 persons, far fewer than those served in Sobocomo's Counterproposal.

If the Commission allocates Channel 288C2 to Moberly, Missouri at 39-26-45, 92-22-49, both the FM 105 and Sobocomo proposals can be granted, resulting in increased service to the populations in both proposals.

Respectfully Submitted,



Patricia M. Watkins  
President  
Sobocomo Radio, Inc.

June 25, 1993

\* While KQMX(FM)'s license was modified on March 17, 1993 as part of MM Docket 91-181 to specify operation on Channel 292A, it has not yet moved and currently operates on Channel 232A.

BROADCAST TECHNICAL INC.  
P.O. BOX 13475 - NEW ORLEANS LA 70185

SOBOCOMO PROPOSED C1 SITE  
KZZT PROPOSED C2 SITE AT ALTERED (SOBO) COORDINATES

|                                    |                        |                 |
|------------------------------------|------------------------|-----------------|
| REFERENCE                          |                        | DISPLAY DATES   |
| 38 46 24 N                         | CLASS C1               | DATA 05-26-93   |
| 92 43 00 W                         | Current rules spacings | SEARCH 06-25-93 |
| ----- CHANNEL 291 -106.1 MHz ----- |                        |                 |

| CALL<br>TYPE  | CH#<br>LAT | CITY<br>LNG | STATE<br>PWR | BEAR'<br>HT | D-KM<br>D-Mi | R-KM<br>R-Mi | MARGIN<br>(KM) |                |
|---|------------|-------------|--------------|-------------|--------------|--------------|----------------|----------------|
| AD291   | 291C1      | Ashland     | MO           | 0.0         | 0.00         | 245.0        | -245.00        | * <sup>1</sup> |
| AD  | 38 46 24   | 92 43 00    | 0.000 kW     | 0M          | 0.0          | 152.3        |                |                |
| Sobocomo Radio, Inc.                                    |            |             |              |             |              |              |                |                |
| KYUA.C  | 291C2      | Ashland     | MO           | 89.4        | 13.95        | 224.0        | -210.05        | * <sup>1</sup> |
| CPM CN  | 38 46 29   | 92 33 22    | 23.000 kW    | 220M        | 8.7          | 139.2        |                |                |
| Sobocomo Radio, Inc.                                    |            |             |              |             |              |              |                |                |
| >Amended 930322   |            |             |              |             |              |              |                |                |
| KDAM  | 292A       | Monroe City | MO           | 41.3        | 120.16       | 133.0        | -12.84         | * <sup>2</sup> |
| LI CN   | 39 35 12   | 91 47 57    | 2.400 kW     | 101M        | 74.7         | 82.7         |                |                |
| Twain Lake Broadcasting, Inc.                           |            |             |              |             |              |              |                |                |
| BLH810716AF   |            |             |              |             |              |              |                |                |
| ALOPEN  | 292A       | Rolla       | MO           | 137.2       | 122.43       | 133.0        | -10.57         | * <sup>3</sup> |
| AL N  | 37 57 50   | 91 45 54    | 0.000 kW     | 0M          | 76.1         | 82.7         |                |                |
| 91-181  |            |             |              |             |              |              |                |                |
| >Effective 4-30-93-Reserved for KQMX per D91-181        |            |             |              |             |              |              |                |                |
| ALOPEN  | 290A       | Wheeling    | MO           | 332.9       | 126.43       | 133.0        | -6.57          | * <sup>4</sup> |
| AL N  | 39 47 12   | 93 23 07    | 0.000 kW     | 0M          | 78.6         | 82.7         |                |                |
| 89-550  |            |             |              |             |              |              |                |                |
| >First Come/First Served Allotment                      |            |             |              |             |              |              |                |                |
| >Effective 10-03-91                                     |            |             |              |             |              |              |                |                |
| KGBXFM  | 290C2      | Bolivar     | MO           | 198.0       | 156.64       | 158.0        | -1.36          | * <sup>5</sup> |
| CP CN   | 37 25 52   | 93 16 06    | 50.000 kW    | 150M        | 97.3         | 98.2         |                |                |
| Sunburst II, Inc.                                       |            |             |              |             |              |              |                |                |
| BPH911003JM   |            |             |              |             |              |              |                |                |
| >*To Nixa, MO per D90-485-From Channel 292A per D88-64  |            |             |              |             |              |              |                |                |
| AD292   | 292A       | Rolla       | MO           | 138.0       | 132.90       | 133.0        | -0.10          | * <sup>3</sup> |
| AD  | 37 53 00   | 91 42 00    | 0.000 kW     | 0M          | 82.6         | 82.7         |                |                |
| Sobocomo Radio, Inc.                                    |            |             |              |             |              |              |                |                |
| >PRM-Alternate Site-Petition for Reconsideration 930422 |            |             |              |             |              |              |                |                |
| KZZT  | 288C3      | Moberly     | MO           | 20.4        | 76.01        | 76.0         | 0.01           | <              |
| LI CN   | 39 24 54   | 92 24 36    | 25.000 kW    | 94M         | 47.2         | 47.2         |                |                |
| FM-105, Inc.  |            |             |              |             |              |              |                |                |
| BLH920506KB   |            |             |              |             |              |              |                |                |
| DE288   | 288C3      | Moberly     | MO           | 20.4        | 76.01        | 76.0         | 0.01           | <              |
| DE  | 39 24 54   | 92 24 36    | 0.000 kW     | 0M          | 47.2         | 47.2         |                |                |



BROADCAST TECHNICAL INC.  
P.O. BOX 13475 - NEW ORLEANS LA 70185

CLASS C1

| CALL<br>TYPE                            | CH#<br>LAT | CITY<br>LNG | STATE<br>PWR | BEAR'<br>HT | D-KM<br>D-Mi | R-KM<br>R-Mi | MARGIN<br>(KM) |
|---|------------|-------------|--------------|-------------|--------------|--------------|----------------|
| FM 105, Inc.                            |            |             |              |             | RM8202       |              | 930310         |
| ALOPEN                                  | 289C2      | Knob Noster | MO           | 270.1       | 79.03        | 79.0         | 0.03 <         |
| AL N                                    | 38 46 28   | 93 37 34    | 0.000 kW     | 0M          | 49.1         | 49.1         |                |
| 92-156                                  |            |             |              |             |              |              |                |
| KZZT                                    | 288A       | Moberly     | MO           | 20.4        | 76.01        | 75.0         | 1.01 <         |
| LI CN                                   | 39 24 54   | 92 24 36    | 6.000 kW     | 100M        | 47.2         | 46.6         |                |
| FM-105, Inc.                            |            |             |              |             | BMLH891213KC |              |                |
| >*To channel 288C3 per D89-550          |            |             |              |             |              |              |                |
| AD288                                   | 288C2      | Moberly     | MO           | 21.3        | 80.13        | 79.0         | 1.13 <         |
| AD                                      | 39 26 45   | 92 22 49    | 0.000 kW     | 0M          | 49.8         | 49.1         |                |
| FM 105, Inc.                            |            |             |              |             | RM8202       |              | 930310         |
| KXXK                                    | 289C3      | Knob Noster | MO           | 270.1       | 79.03        | 76.0         | 3.03           |
| LI CN                                   | 38 46 28   | 93 37 34    | 13.500 kW    | 89M         | 49.1         | 47.2         |                |
| Bick Broadcasting Company               |            |             |              |             | BLH920501KC  |              |                |
| >*To Amend to Channel 289C2 per D92-156 |            |             |              |             |              |              |                |
| AP290                                   | 290A       | Wheeling    | MO           | 335.1       | 136.30       | 133.0        | 3.30           |
| AP CN                                   | 39 53 14   | 93 22 53    | 6.000 kW     | 100M        | 84.7         | 82.7         |                |
| Patricia Mae Watkins                    |            |             |              |             | 930402MB     |              |                |
| WSMIFM                                  | 291B       | Litchfield  | IL           | 78.7        | 274.07       | 270.0        | 4.07           |
| LI CN                                   | 39 15 21   | 89 36 48    | 50.000 kW    | 140M        | 170.3        | 167.8        |                |
| Talley Broadcasting Corporati           |            |             |              |             | BLH800922AJ  |              |                |

- 1 Counterpetitioner
- 2 Counterproposal requested substitution of Channel 298A
- 3 Counterproposal requested substitution of Channd1 276C3
- 4 Counterproposal requested modification of allocation coordinates to 39-53-14, 93-22-53
- 5 Moved to 37-17-10, 93-10-15 in RM 7433, clearance of 11.79 kilometers, Commission approval effective 8/9/91.

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing document was mailed June 28, 1993, by First Class U.S. Mail, postage prepaid, to the following:

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Radio Station KQMX(FM)  
P.O. Box 728  
Rolla, MO 65401

Ms. Patricia Watkins  
561 West Highway MM  
Ashland, MO 65010  
Applicant for CH 290A at Wheeling, MO

  
\_\_\_\_\_

June 28, 1993

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\*Hand Delivered